

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

CONSUMER FINANCIAL PROTECTION
BUREAU, et al.,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC FINANCIAL
SOLUTIONS, LLC), et al.

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.

CASE NO.

**NOTICE OF PLAINTIFFS' *EX*
PORTE MOTION TO
TEMPORARILY SEAL THE
ENTIRE FILE, INCLUDING
DOCKET**

(FILED UNDER SEAL)

For the reasons set forth in the accompanying Memorandum of Law in Support of Plaintiff's *Ex Parte* Motion to Seal the Entire File, Including Docket, Plaintiffs Consumer Financial Protection Bureau, the People of the State of New York, by Letitia James, Attorney General of the State of New York, the State of Colorado *ex rel.* Philip J. Weiser, Attorney General, the State of Delaware *ex rel.* Kathleen Jennings, Attorney General, the People of the State of Illinois through Attorney General Kwame Raoul, the State of Minnesota by its Attorney General Keith Ellison, the State of North Carolina *ex rel.* Joshua H. Stein, Attorney General, and the State of Wisconsin (collectively, Plaintiffs), hereby request that this Court grant this *ex parte* application for an order temporarily sealing the entire file and docket in this matter. Plaintiffs request that the seal on the entire file remain in effect until the earlier of (a) five business days

after the Court has ruled on Plaintiffs' motion for a temporary restraining order (TRO), or (b) Plaintiffs provide notice that all Defendants and Relief Defendants have been served with the TRO or other preliminary order(s) of the Court. A Proposed Order is submitted herewith.

Plaintiffs will suffer irreparable injury if this application is not granted, as there is a strong likelihood that Defendants will destroy evidence and dissipate assets if they learn of Plaintiffs' action against them prior to being served. Accordingly, Plaintiffs request this motion be granted.

WHEREFORE, Plaintiffs respectfully request that this Court grant this motion by entering the accompanying Proposed Order sealing the entire case file temporarily.

Dated: January 10, 2024

Respectfully submitted,
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